

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE WORLD TRADE CENTER DISASTER	:	21 MC 100 (AKH)
SITE LITIGATION	:	(All Cases)
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IN RE WORLD TRADE CENTER LOWER	:	21 MC 102 (AKH)
MANHATTAN DISASTER SITE LITIGATION	:	(All Cases)
-----X		
IN RE COMBINED WORLD TRADE CENTER	:	21 MC 103 (AKH)
AND LOWER MANHATTAN DISASTER SITE	:	(All Cases)
LITIGATION (straddler plaintiffs)	:	
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**SUPPLEMENTAL DECLARATION IN SUPPORT OF  
MOTION TO DISMISS CERTAIN PLAINTIFFS' CLAIMS**

CHRISTOPHER R. LOPALO, an attorney duly licensed to practice before the Courts of the State of New York and a Member of the Bar of this Honorable Court hereby declares under penalty of perjury:

1. I am associated with the law firm of Worby Groner Edelman & Napoli Bern, LLP ("WGENB"), in these matters and respectfully submit this Declaration In Support Of The Motion For Dismissals Against All Defendants in Certain Plaintiffs' Cases.

2. On March 1, 2012, our office made a motion to voluntarily dismiss certain Plaintiffs' claims pursuant to Federal Rule of Civil Procedure 41 (a)(2) so that they can participate and seek compensation in the Victims' Compensation Fund pursuant to the Zadroga Act.

3. At the court conference on March 2, 2012, the Court indicated that it will hold Plaintiffs' motion in abeyance until March 16, 2012 to provide opportunity for objections, which did not occur.

4. Since March 2, 2012, our office has conferred with Patton Boggs, LLP, who as the Court is aware, represents certain Defendants.

5. As a result of these conferences, our office has now prepared an amended Schedule A to Exhibit 2 to its March 2, 2012 motion.

6. Accordingly, Plaintiffs respectfully request that the Court replace Exhibit 2 to Plaintiffs' March 1, 2012 motion with the attached Exhibit 2 and "So Order" these Voluntary Dismissals with Prejudice.

Dated: New York, New York  
March 16, 2012

/s/ Christopher R. LoPalo  
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